



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 28 2012

OFFICE OF
AIR AND RADIATION

Mr. Jeffrey T. Steeber
Alternate Designated Representative
Environmental, Health and Safety Engineer
Hunlock Creek Energy Center
390 Route 11
Hunlock Creek, PA 18621

Re: Petition for Extension of the CEMS Certification Deadline for Units CT5 and CT6 at the Hunlock Creek Energy Center (Facility ID (ORISPL) 3176)

Dear Mr. Steeber:

The United States Environmental Protection Agency (EPA) has reviewed the October 19, 2011 petition submitted by the Hunlock Creek Energy Center (Hunlock) under §75.66(a), in which Hunlock requested an extension of the deadline for completing continuous emission monitoring system (CEMS) certification testing at two new combined-cycle combustion turbines. EPA approves the petition in part, with conditions, as discussed below.

Background

The Hunlock Generating Facility, located in Hunlock Creek, Pennsylvania includes two new combined cycle gas-fired combustion turbines, known as Units CT5 and CT6. These units are subject to the Acid Rain Program and the Clean Air Interstate Rule (CAIR) NO_x and SO₂ Trading Programs. Therefore, Hunlock is required to continuously monitor and report sulfur dioxide (SO₂), nitrogen oxides (NO_x), and carbon dioxide (CO₂) emissions and heat input for Units CT5 and CT6 in accordance with 40 CFR Part 75. To meet these monitoring requirements, Hunlock has installed and certified fuel flow meters and NO_x emission rate CEMS.

For a new Acid Rain Program unit, §75.4(b)(2) specifies the "compliance date" by which the required CEMS must be certified. The compliance date is 180 calendar days after the unit commences commercial operation (as defined in 40 CFR 72.2). Under CAIR, however, the compliance date is the earlier of 90 unit operating days or 180 calendar days after the unit commences commercial operation (see 40 CFR Part 96, sections 96.170(b), 96.270(b), and 96.370(b)).

According to Hunlock, Units CT5 and CT6 commenced commercial operation on June 2 and May 28, 2011¹, respectively. The units have operated very little since then. As of November 29, 2011, Unit CT5 had operated on only 59 days and Unit CT6 had operated on only 27 days.² Therefore, the applicable compliance date for Unit CT5 is November 29, 2011, which is 180 calendar days after June 2, 2011, and the compliance date for CT6 is November 24, 2011, which is 180 calendar days after May 28, 2011.³

Although Unit CT5 was operational on its compliance date, the CEMS certification testing on Unit CT5 was not completed until December 6, 2011, seven days after the certification deadline of November 29, 2011. According to Hunlock, the certification deadline was not met due to flooding that required pumps, condensers, motors and electrical panels to be rebuilt.⁴

In the October 19, 2011 petition and in subsequent e-mails, Hunlock states that the CEMS certification testing at Unit CT6 was not completed by November 24, 2011 due to major equipment failure. On July 28, 2011, when Unit CT6 was in the process of starting up, the unit experienced back pressure, which should have tripped the combustion turbine and kept it from firing, but it did not. As a result, the walls of the heat recovery steam generator (HRSG) were bowed out, causing severe structural damage. Presently, the HRSG is being dismantled and new modules are on order. According to Hunlock, it will take about 26 weeks to receive the new modules, and after the modules arrive, it will take several more weeks to reassemble the HRSG. Unit CT6 is not expected to be operational until May 2012 at the earliest.

In the October 19, 2011 petition, Hunlock requested an extension of the CEMS certification deadlines for Units CT5 and CT6. Specifically, Hunlock asked for an additional 720 unit operating hours to complete the testing at each unit.

EPA's Determination

In view of the circumstances that caused the CEMS certification on CT5 to be delayed, EPA approves a seven day extension of the November 29, 2011 certification deadline, i.e., to

¹ In the October 19, 2011 petition, Hunlock incorrectly identified the "commence commercial operation" date for both units as July 1, 2011. However, the actual dates on which the CT5 and CT6 commenced commercial operation by selling electricity to the grid were June 2 and May 28, 2011, respectively. Hunlock confirmed these dates in an e-mail dated January 6, 2012.

² This information was provided by Hunlock in e-mails on November 30, 2011 and January 6, 2012.

³ Due to the limited operation of the units since they commenced commercial operation on June 2 and May 28, 2011, neither unit accumulated 90 operating days prior to "day 180". Therefore, since "day 180" occurred before the 90th operating day for both units, the applicable compliance dates for CT5 and CT6 are November 29 and 24, 2011, respectively.

⁴ This information was provided by Hunlock in an e-mail dated November 15, 2011.

December 6, 2011. In the past, EPA has granted similar test deadline extensions, for up to 720 unit operating hours when necessary. However in this case, only seven extra days beyond the November 29, 2011 deadline were required to complete the testing.

Although EPA is approving an extension of the deadline for completing the CEMS certification testing at Unit CT5, this does not relieve Hunlock of its responsibility under §75.64(a) to report emissions data for CT5 starting from the earlier of the relevant compliance date in §75.4(b) or the date on which certification testing is completed. In this case, since the compliance date in §75.4(b)(2) preceded the completion of certification testing by seven calendar days, Hunlock must report NO_x emission rate data for each unit operating hour, starting with the first operating hour after November 29, 2011 and continuing through the hour in which the certification testing was successfully completed. During that time, Hunlock shall report NO_x emission rate data for CT5 in accordance with §75.4(j), using either:

- (1) The maximum potential NO_x emission rate;
- (2) Reference methods under §75.22(b); or
- (3) Another procedure approved by the Administrator pursuant to a petition under §75.66.

Regarding Hunlock's request for an extension of the November 24, 2011 deadline to complete the initial CEMS certification testing at Unit CT6, a special petition is unnecessary. In cases where certification testing cannot be completed by the applicable compliance date due to a forced unit outage, §75.4(d) already provides an additional window of time in which to complete CEMS certification (i.e., 90 operating days or 180 calendar days, whichever occurs first, after the unit recommences operation). A petition is not required in such cases; rather, the owner or operator must provide notification of the outage, in accordance with §75.61(a)(3). In view of this, EPA is treating the October 19, 2011 petition as the required notification.

In accordance with §75.64(a), when a unit is shut down on its compliance date and the owner or operator is unable to complete certification testing, quarterly emissions reports are not required until the unit recommences operation. Therefore, emissions reporting for Unit CT6 is not required until the calendar quarter in which the unit recommences operation. For all unit operating hours after November 24, 2011 until the required CEMS certification tests at Unit CT6 are successfully completed, Hunlock shall report NO_x emission rate data for Unit CT6 in accordance with §75.4(d), using either:

- (1) The maximum potential NO_x emission rate (as defined in 40 CFR 72.2);
- (2) The conditional data validation provisions of §75.20(b)(3);
- (3) Reference methods under §75.22; or
- (4) Another procedure approved by the Administrator pursuant to a petition under §75.66

EPA's determination relies on the accuracy and completeness of Hunlock's October 19, 2011 petition and the subsequent e-mails dated November 15, 21, and 30, 2011 and January 6, 2012 and is appealable under 40 CFR Part 78. If you have any questions regarding this determination, please contact Charles Frushour at (202) 343-9847. Thank you for your continued cooperation.

Sincerely,



Richard Haeuber, Acting Director
Clean Air Markets Division

c: Leonard Hotham, EPA Region III
Charles Zadakis, Pennsylvania Department of Environmental Protection (PADEP)
Charles Frushour, CAMD

COMMONWEALTH OF PENNSYLVANIA
Department of Environmental Protection

November 4, 2005

SUBJECT: Review of Application
Title V Operating Permit
Hunlock Creek Energy Ventures - Hunlock Power Station
Hunlock Township, Luzerne County

TO: Air Quality Permit File: TV 40-0005

THRU: Norman Frederick
Facilities Section Chief
Air Quality Program

Thomas A. DiLazaro
Regional Air Quality Program Manager

FROM: James I. Garner
Air Pollution Control Engineer
Facilities Section

Background Information:

Hunlock Creek Energy Ventures (formerly UGI Utilities, Inc.) owns and operates the Hunlock Power Station located in Hunlock Township, Luzerne County, a facility used for electric power generation.

On August 28, 2002, Hunlock Creek Energy Ventures submitted an application to renew the Title V Operating Permit previously issued on February 12, 1998. The application was received and deemed timely and complete on September 16, 2002. An application shield, as defined under 25 Pa. Code, §127.505(e), for existing permits at the Hunlock Power Station was granted to UGI Utilities, Inc. at that time.

In addition to renewing the Title V Operating Permit, the new permit will include Compliance Assurance Monitoring (CAM) provisions and any changes that have occurred at the facility over the past 5 years.

Acid Rain Permit

Included with and incorporated into the Title V permit is the renewed Acid Rain permit (Attachment A). The Acid Rain permit attachment allocates SO₂ emission allowances and establishes NO_x requirements for the #6 Boiler (Source 031).

Compliance Assurance Monitoring:

Foster Wheeler Boiler #6 (Source 031) is a major source subject to the CAM provisions of 40 CFR Part 64. Hunlock Creek Energy Ventures has submitted a CAM plan with the Title V Operating Permit Renewal Application, and provisions for Data Collection & Recordkeeping, Control Device Operating Ranges, Excursion Reporting, Maintenance Data Representativeness, Operation Status Verification, QA/QC Practices and Quality Improvement have been included in the Title V Operating Permit for Electrostatic Precipitators #1 & #2 (Control Devices C01 & C02).

All other monitoring, recordkeeping & reporting requirements were carried over from the previous Title V Operating Permit unchanged.

Conclusions & Recommendations:

Hunlock Creek Energy Ventures' application for the renewal of the Title V Operating Permit for the Hunlock Power Station is complete. It is my recommendation that the Title V Operating Permit for this facility be renewed.

42-079-00014



**Fw: UGI Development Company, Hunlock Creek Energy Center (Formerly
Hunlock Power Station)**
Leonard Hotham to: Robert McBride

02/02/2011 03:04 PM

----- Forwarded by Leonard Hotham/R3/USEPA/US on 02/02/2011 03:04 PM -----

From: "JEFF STEEBER" <JSTEEBER@ugies.com>
To: Leonard Hotham/R3/USEPA/US@EPA
Date: 10/14/2010 07:45 AM
Subject: UGI Development Company, Hunlock Creek Energy Center (Formerly Hunlock Power Station)

Mr. Hotham,

RE: UGI Development Company
Hunlock Creek Energy Center (Formerly Hunlock Power Station)
ORIS Code: 3176
CEM Phase I Protocol Submittal for CT5 & CT6 Combustion Turbines
Permit No. 40-328-006

UGI Development Company, Hunlock Creek Energy Center is submitting the Phase I Protocol and a 40 CFR Part 75 Monitoring Plan for installing a Continuous Emission Monitoring System for Hunlock Power Station's Combustion Turbines (CT5 & CT6). A copy of all files were also submitted to the Pennsylvania Department of Environmental Protection (PADEP).

If you should have any questions please contact me at 570-542-5369 Ext. 232.

Sincerely,

Jeff Steeber
Environmental, Health and Safety
UGI Development Company
Hunlock Creek Energy Center
390 Route 11
Hunlock Creek, Pa. 18621
Phone: 570-542-5369 Ext. 232



jsteeber@ugies.com Hunlock 56 qap_rev0.pdf


































hunlockU5_012_CEMS-Analyzer Cross-Reference Information.doc



hunlockU5_001_Phase I General Information.doc



hunlockU5_002_Phase I Record Keeping Information.doc

 
 hunlockU5_003_Phase I Quality Assurance Information.doc hunlockU5_004_Facility Information.doc
 
 hunlockU5_005_Source Combination Information.doc hunlockU5_006_Emission Results.doc
 
 hunlockU5_007_Emission Standards.doc hunlockU5_008_Data Availability Standards.doc
 
 hunlockU5_009_CEMS Information.doc hunlockU5_010_Analyzer Information.doc
 
 hunlockU5_011_Drift Limit Information.doc hunlockU6_012_CEMS-Analyzer Cross-Reference Information.doc
 
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 50210A02-1_samplesysflow.pdf Probe_270SF MAN-NH3 cut sheet.pdf CO analyzer Lit_48iAQI_1209data.pdf
  
 gas_cooler ECMpe.pdf NOx analyzer Lit_42iLSAQI_1009datasheet.pdf O2 analyzer1440D.pdf
 
 Final Plan Approval from Mark Wejkszner March 2010.pdf Final Hunlock monplan submittal_5_24_10.pdf

42-079-00014



Fw: UGI Development Company, Hunlock Creek Energy Center Phase I Protocol Revision 1

Leonard Hotham to: Robert McBride

01/11/2011 08:11 AM

----- Forwarded by Leonard Hotham/R3/USEPA/US on 01/11/2011 08:11 AM -----

From: "JEFF STEEBER" <JSTEEBER@ugies.com>
To: Leonard Hotham/R3/USEPA/US@EPA
Date: 12/17/2010 12:04 PM
Subject: Fwd: UGI Development Company, Hunlock Creek Energy Center Phase I Protocol Revision 1

Mr. Hotham,

Attached is an email that I sent to the Pennsylvania Department of Environmental Protections (PADEP) Hitesh Suri concerning UGI Development Company's CEMS Phase I Protocol.

If you should have any questions please contact me at (570) 542-5369 Ext. 232.

Thank You,

Jeffrey T. Steeber
Environmental, Health & Safety
UGI Development Company
Hunlock Creek Energy Center
390 Route 11
Hunlock Creek, Pa. 18621
Office Phone: 570-542-5369 Ext 232
Cell: 570-417-7733
Fax: 570-542-5643

----- Message from "JEFF STEEBER" <JSTEEBER@ugies.com> on Fri, 17 Dec 2010 11:37:31 -0500 -----

To: <Hsuri@state.pa.us>

cc: <czadakis@state.pa.us>

Subject UGI Development Company, Hunlock Creek Energy Center Phase I Protocol
: Revision 1

Mr. Suri,

UGI Development Company, Hunlock Creek Energy Center is submitting a revision to its previously submitted Phase I Protocol. The reason for the revision is that UGI is adding a second range to its CO Analyzer. The dual ranges will be 0-20/0-2000 ppm.

Attached are the revised documentation for the Phase I Protocol. If you should have any questions please contact me at (570) 542-5369 Ext. 232.

Thank You,

Jeffrey T. Steeber
Environmental, Health & Safety
UGI Development Company
Hunlock Creek Energy Center
390 Route 11
Hunlock Creek, Pa. 18621
Office Phone: 570-542-5369 Ext 232
Cell: 570-417-7733



Fax: 570-542-5643 [hunlockU6_010_Analyzer InformationRev1.doc](#) [Hunlock 56 qap_rev1.pdf](#)



[Hunlock monplan submittal_Rev1.pdf](#) [hunlockU5_010_Analyzer InformationRev1.doc](#)

42- 079-00014

Fw: UGI Development Company, Hunlock Creek Energy Center (Formerly Hunlock Power Station)

Leonard Hotham to: Robert McBride

10/14/2010 07:51 AM

----- Forwarded by Leonard Hotham/R3/USEPA/US on 10/14/2010 07:51 AM -----



"JEFF STEEBER"
<JSTEEBER@ugies.com>
10/14/2010 07:37 AM

To Leonard Hotham/R3/USEPA/US@EPA
cc

Subject UGI Development Company, Hunlock Creek Energy Center
(Formerly Hunlock Power Station)

Mr. Hotham,

RE: UGI Development Company
Hunlock Creek Energy Center (Formerly Hunlock Power Station)
ORIS Code: 3176
CEM Phase I Protocol Submittal for CT5 & CT6 Combustion Turbines
Permit No. 40-328-006

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If you should have any questions please contact me at 570-542-5369 Ext. 232.


































Sincerely,

Jeff Steeber
Environmental, Health and Safety
UGI Development Company
Hunlock Creek Energy Center
390 Route 11
Hunlock Creek, Pa. 18621
Phone: 570-542-5369 Ext. 232

jsteeber@ugies.com Hunlock 56 qap_rev0.pdf



hunlockU5_012_CEMS-Analyzer Cross-Reference Information.doc

 hunlockU5_001_Phase I General Information.doc  hunlockU5_002_Phase I Record Keeping Information.doc
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 hunlockU5_005_Source Combination Information.doc  hunlockU5_006_Emission Results.doc
 hunlockU5_007_Emission Standards.doc  hunlockU5_008_Data Availability Standards.doc
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 gas_cooler ECMpe.pdf  NOx analyzer Lit_42iLSAQI_1009datasheet.pdf  O2 analyzer1440D.pdf
 Final Plan Approval from Mark Wejkszner March 2010.pdf  Final Hunlock monplan submittal_5_24_10.pdf



Insp ID 1675954

Enf ID 229543

Pennsylvania Department of Environmental Protection

2 Public Square
Wilkes-Barre, PA 18711-0790
January 10, 2008

Northeast Regional Office

570-826-2511
Fax 570-826-2357

NOTICE OF VIOLATION

CERTIFIED MAIL NO. 7007 0710 0000 0764 5916

UGI Development Co.
P.O. Box 224
390 Route 11
Hunlock Creek, PA 18621

Received

JAN 18 2008

Attention: Mr. David R. Stettler
Power Production Manager

Compliance and Enforcement Division

Re: Notice of Violation

Dear Mr. Stettler:

On December 26, 2007, the Department received the 2006 Annual Compliance Certification Form for UGI Development Company located in Hunlock Township, Luzerne County. Late submittal of the Annual Compliance Certification Form is a violation of TV 40-00005, Section B, Condition #024 and 25 Pa. Code §127.444 of the Rules and Regulations of the Department of Environmental Protection.

TV 40-00005, Section B, Condition #024 states that:

- (a) One year after the date of issuance of the Title V Permit, and each year thereafter, unless specified elsewhere in the permit, the permittee shall submit to the Department and EPA Region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emissions limitations, standards or work practices. This certification shall include:
 - (1) The identification of each term or condition of the permit that is the basis of the certification.
 - (2) The compliance status.
 - (3) The methods used for determining the compliance status of the source, currently and over the reporting period.
 - (4) Whether compliance was continuous or intermittent.
- (b) The compliance certification should be postmarked or hand-delivered within thirty days of each anniversary date of the date of issuance to the Department and EPA in accordance with the submission requirements specified in Condition #020 of this section.

January 10, 2008

25 Pa. Code § 127.444 states that a person may not cause or permit the operation of a source subject to this article unless the source and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued to the source are operated and maintained in accordance with specifications in the application and conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to this chapter in a manner inconsistent with good operating practices.

You are advised that failure to comply with the aforementioned Rules and Regulations of the Department of Environmental Protection constitutes unlawful conduct and could result in legal action, as described in the Air Pollution Control Act of January 8, 1960, P.L. 2119, as amended, 35 P.S. §4008, et seq.

This Notice of Violation is neither an order nor any other final action of the Department of Environmental Protection. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action.

If you have any questions regarding the above or desire clarification, please contact this office.

Sincerely,



Christian Ostrowski
Air Quality Specialist
Air Quality Program

42 - 079- 00014

Fw: Hunlock Creek CT #4 Testing Notification
Leonard Hotham to: Robert McBride

08/30/2010 05:03 PM

----- Forwarded by Leonard Hotham/R3/USEPA/US on 08/30/2010 09:07 AM -----



"Stepan, John S."

<JSTEPAN@alleghenyenerg
y.com>

07/08/2010 06:00 PM

To Leonard Hotham/R3/USEPA/US@EPA

cc <czadakis@state.pa.us>, <jpitulski@state.pa.us>,
<costrowski@state.pa.us>

Subject RE: Hunlock Creek CT #4 Testing Notification

Hunlock Creek CT #4 CEMS RATA is completed. Preliminary results indicate that they passed the PA DEP parameters and passed at the increased accuracy for 4 operating quarters in accordance with part 75.....John

From: Stepan, John S.

Sent: Wednesday, July 07, 2010 5:21 PM

To: 'US EPA Region 3 (Hotham.Leonard@epamail.epa.gov)'

Cc: 'czadakis@state.pa.us'; 'jpitulski@state.pa.us'; 'Christian Ostrowski (costrowski@state.pa.us)'

Subject: RE: Hunlock Creek CT #4 Testing Notification

The testing consultant had a failure of their equipment today before the RAAT started and was unable to repair it. They are having an overnight shipment and we expect to start the RATA tomorrow July 8th at about 12:30.....John

From: Stepan, John S.

Sent: Wednesday, June 30, 2010 12:23 PM

To: 'US EPA Region 3 (Hotham.Leonard@epamail.epa.gov)'

Cc: 'czadakis@state.pa.us'; 'jpitulski@state.pa.us'; 'Christian Ostrowski (costrowski@state.pa.us)'

Subject: RE: Hunlock Creek CT #4 Testing Notification

The unit is scheduled as follows:

July 7th, 2010 1000 – 1800

Testing is expected to start soon after the unit reaches high load. The testing consultant will arrive the day before to mobilize.....John

From: Stepan, John S.

Sent: Thursday, June 10, 2010 10:45 AM

To: 'US EPA Region 3 (Hotham.Leonard@epamail.epa.gov)'

Cc: 'czadakis@state.pa.us'; 'jpitulski@state.pa.us'; Christian Ostrowski (costrowski@state.pa.us)

Subject: Hunlock Creek CT #4 Testing Notification

Allegheny Energy Supply Company, LLC

Hunlock Creek CT # 4

390 Route 11

Hunlock Creek, PA 18621

RATA Protocol / Test Notification

Allegheny Energy Service Corporation as Agent for Allegheny Energy Supply Company, LLC is providing pre-test notification for the Allegheny Energy Supply, LLC Hunlock Creek CT #4 RATA. This RATA is tentatively scheduled to start July 7, 2008. The facility is a natural gas fired simple cycle combustion turbine with an associated generator for the commercial production of electricity.

The protocol/notification has been submitted as protocol # 144 for CEMDPS facility ID 343. Testing will be similar to that previously conducted, but for your convenience, attached is a copy of the pretest protocol. Please contact me with any comments or if you plan on observing.

<< File: Hunlock 2010.doc >>

John S. Stepan

Environmental Performance and Compliance

Air Quality

643 N. Main Street

Greensburg, PA 15601

Phone (724) 838 6155 FAX (724) 830-7869 RFAX (724) 850 3742

e-mail jstepan@alleghenyenergy.com

42-079-00014

Fw: Hunlock Creek CT #4 Testing Notification
Leonard Hotham to: Robert McBride

08/30/2010 05:03 PM

----- Forwarded by Leonard Hotham/R3/USEPA/US on 08/30/2010 09:07 AM -----



"Stepan, John S."

<JSTEPAN@alleghenyenergy.com>

06/10/2010 10:45 AM

To Leonard Hotham/R3/USEPA/US@EPA

cc <czadakis@state.pa.us>, <jpitulski@state.pa.us>, <costrowski@state.pa.us>

Subject Hunlock Creek CT #4 Testing Notification

Allegheny Energy Supply Company, LLC

Hunlock Creek CT # 4

390 Route 11

Hunlock Creek, PA 18621

RATA Protocol / Test Notification

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The protocol/notification has been submitted as protocol # 144 for CEMDPS facility ID 343. Testing will be similar to that previously conducted, but for your convenience, attached is a copy of the pretest protocol. Please contact me with any comments or if you plan on observing.

<<Hunlock 2010.doc>>

John S. Stepan

Environmental Performance and Compliance

Air Quality

643 N. Main Street

Greensburg, PA 15601

Phone (724) 838 6155 FAX (724) 830-7869 RFAX (724) 850 3742



e-mail jstepan@alleghenyenergy.com Hunlock 2010.doc

HPV

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the matter of:

UGI Development Company
PO Box 224
390 Route 11
Hunlock Creek, PA 18621

: Violations of Air Pollution Control Act
: and Air Resource Regulations – NOx and
: Opacity exceedences (3rd Quarter 2004 –
: 1st Quarter 2006) & Late submittal of the
: 2006 Annual Compliance Certification

CONSENT ASSESSMENT OF CIVIL PENALTY

9-16 This Consent Assessment of Civil Penalty ("CACP") is entered into this day of September, 2008, by and between the Commonwealth of Pennsylvania, Department of Environmental Protection ("Department"), and UGI Development Company ("UGI").

The Department has found and determined the following:

- A. The Department is the agency with the duty and authority to administer and enforce the Air Pollution Control Act, Act of January 8, 1960, P.L. 2119 (1959), as amended, 35 P.S. § 4001 et seq. ("Air Pollution Control Act"); Section 1917-A of the Administrative Code of 1929, Act of April 9, 1929, P.L. 177, as amended, 71 P.S. § 510-17 ("Administrative Code") and the rules and regulations promulgated thereunder.
- B. UGI is a Pennsylvania corporation with a registered address of 460 N. Gulph Road, King of Prussia, PA 19406.
- C. UGI maintains a business address of P.O. Box 224, 390 Route 11, Hunlock Creek, PA 18621.
- D. UGI owned and operated, at all relevant times, a power production facility, consisting, in part, of one Foster Wheeler Boiler ("Boiler # 6") and one simple gas turbine ("Turbine") located in Hunlock Township, Luzerne County, Pennsylvania ("Facility").
- E. Boiler # 6 is equipped, in part, with an opacity Continuous Emission Monitoring Systems ("CEM") to measure percent opacity with emission resultant identification number 250.
- F. The Turbine is equipped with a NOx CEM to measure parts per million ("ppm") NOx with emission resultant identification number 1568 and a NOx CEM to measure pounds per hour ("lbs/hr") NOx with emission resultant identification number 1569.



Pennsylvania Department of Environmental Protection

2 Public Square
Wilkes-Barre, PA 18711-0790
September 10, 2008

Northeast Regional Office

570-826-2511
Fax 570-826-2357

UGI Development Company
P.O. Box 224
390 Route 11
Hunlock Creek, PA 18621

Attention: Mr. David R. Stettler, Power Production Manager

Re: Consent Assessment of Civil Penalty

Dear Mr. Stettler:

Enclosed for your records is one (1) executed copy of the Consent Assessment of Civil Penalty between UGI Development Company and the Department of Environmental Protection.

Sincerely,

Jeremy D. Miller
Compliance Specialist
Air Quality Program

Enclosure



G. On February 12, 1998, the Department issued Title V Operating Permit Number 40-00005 ("1998 Title V Permit") to UGI for the operation of multiple sources at the facility, including Boiler # 6. The 1998 Title V Permit was renewed on October 31, 2005 and included the Turbine which was installed after the 1998 Title V Permit was issued ("2005 Title V Permit").

H. The following condition, in relevant part, is included in the Facility's 1998 Title V Permit:

Section C, Condition #004(a) provides that the permittee may not permit the emission into the outdoor atmosphere of visible air contaminants in such a manner that the opacity of the emission is either equal or greater than 20% for a period or periods aggregating more than three minutes in any 1 hour or equal to or greater than 60% at any time.

I. The following conditions, in relevant part, are included in the Facility's 2005 Title V Permit:

Section B, Condition #024 (a) provides, one year after the date of issuance of the Title V Permit, and each year thereafter the permittee shall submit to the Department and EPA region III a certificate of compliance with the terms and conditions in this permit, for the previous year, including the emissions limitations, standards or work practices.

Section D, Source CT1, Condition #003(a) provides, the emissions of Nitrogen Oxides (expressed as NO_x) from this source shall not exceed 25 ppm (@15% O₂) of Nitrogen Oxides. This limit applies at all times except during periods of start-up or shutdown.

Section D, Source CT1, Condition #003(b) provides, the emission of NO_x from this source shall not exceed 41 Lbs. Per Hour (based on a 3-hour rolling average) of Nitrogen Oxides.

J. The regulations promulgated under the Air Pollution Control Act provide in relevant part, as follows:

- 1) 25 Pa. Code §127.444 provides that a person may not cause or permit the operation of a source subject to this article unless the source and air cleaning devices identified in the application for the plan approval and operating permit and the plan approval issued to the source are operated and maintained in accordance with specifications in the application and conditions in the plan approval and operating permit issued by the Department. A person may not cause or permit the operation of an air contamination source subject to this chapter in a manner inconsistent with good operating practices.

- 2) 25 Pa. Code §123.41 prohibits the emission of visible air contaminants in such a manner that the opacity of the emissions is either of the following: equal to or greater than 20% for a period or periods aggregating more than 3 minutes in any hour, or equal to or greater than 60% at any time.

K. The following violations occurred at the Facility:

- 1) From July 1, 2004, to September 30, 2004, UGI operated Boiler #6 in such a manner that, on specified days during the quarter, the opacity exceeded the limits set forth in the 1998 Title V Permit Section C, Condition #004(a), in violation of the 1998 Title V Permit Section C, Condition #004(a) and 25 Pa. Code §§ 127.444 and 123.41.
- 2) On February 23 and February 24, 2005 UGI operated the Turbine in such a manner that the NOx emissions exceeded the NOx Lbs per hour emission limits set forth in the 2005 Title V Permit Section D, Source CT1, Condition #003(a), in violation of the 2005 Title V Permit Section D, Source CT1, Condition #003(a) and 25 Pa. Code § 127.444.
- 3) On November 3, 2005, December 29, 2005 and February 23, 2006, UGI operated the Turbine in such a manner that the NOx emissions exceeded the NOx Lbs per hour emission limits set forth in the 2005 Title V Permit Section D, Source CT1, Condition #003(b) in violation of the 2005 Title V Permit Section D, Source CT1, Condition #003(b) and 25 Pa. Code § 127.444.
- 4) On December 26, 2007, the Department received the calendar year 2006 annual compliance certification form from UGI after the October 31, 2007 due date in violation of TV Permit, Section B, Condition #024 and 25 Pa. Code § 127.444

L. The violations described in paragraph K constitute unlawful conduct under Section 8 of the Air Pollution Control Act, 35 P.S. § 4008; a statutory nuisance under Section 13 of the Air Pollution Control Act, 35 P.S. § 4013; and subject UGI to a claim for civil penalties under Section 9.1 of the Air Pollution Control Act, 35 P.S. § 4009.1.

After full and complete negotiation of all matters set forth in this CACP and upon mutual exchange of the covenants herein, the parties desiring to avoid litigation and intending to be legally bound, it is hereby ASSESSED by the Department and AGREED to by UGI as follows:

1. Assessment. In resolution of the Department's claim for civil penalties, which the Department is authorized to pursue under Section 9.1 of the Air Pollution Control Act, the Department hereby assesses a civil penalty of eight thousand three hundred thirty dollars (\$8,330.00), which UGI hereby agrees to pay.

2. Civil Penalty Settlement. Upon signing this CACP, UGI shall pay the civil penalty assessment in Paragraph 1. This payment is in settlement of the Department's claim for civil penalties for the violations set forth in Paragraph K, above, for the date(s) set forth in Paragraph J., above. The payment shall be by corporate check or the like, made payable to "Commonwealth of Pennsylvania-Clean Air Fund" and sent to the Air Quality Program Manager, PA Department of Environmental Protection, 2 Public Square, Wilkes-Barre, PA 18711.

3. Findings.

a) UGI agrees that the findings in Paragraphs A through L are true and correct and, in any matter or proceeding involving UGI and the Department, UGI shall not challenge the accuracy or validity of these findings.

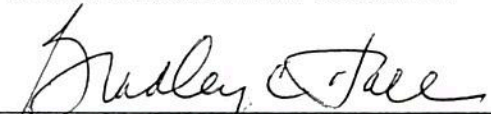
b) The parties do not authorize any other persons to use the findings in this CACP in any matter or proceeding.

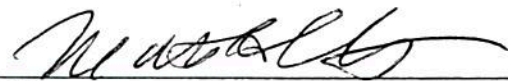
4. Reservation of Rights. The Department reserves all other rights with respect to any matter addressed by this CACP, including the right to require abatement of any conditions resulting from the events described in the Findings. UGI reserves the right to challenge any action which the Department may take, but waives the right to challenge the content or validity of this CACP.

IN WITNESS WHEREOF, the parties have caused this CACP to be executed by their duly authorized representatives. The undersigned representatives of UGI certify, under penalty of law, as provided by 18 Pa. C.S. § 4904, that they are authorized to execute this CACP on behalf of UGI, that UGI consents to the entry of this CACP as an ASSESSMENT of the Department; that UGI hereby knowingly waives any right to a hearing under the statutes referenced in this CACP; and that UGI knowingly waives its right to appeal this CACP, which rights may be available under Section 4 of the Environmental Hearing Board Act, the Act of July 13, 1988, P.L. 530, No. 1988-94, 35 P.S. § 7514; the Administrative Agency Law, 2 Pa. C.S. § 103(a) and Chapters 5A and 7A; or any other provision of law. Signature by UGI attorney certifies only that the agreement has been signed after consulting with counsel.

FOR

UGI DEVELOPMENT COMPANY


Name: BRADLEY C. HALL
Title: PRESIDENT


Name: MATTHEW S. DUTZMAN
Title: VICE PRESIDENT


Name: TIM SACHAL
Attorney for UGI Development
Company

FOR THE

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION


Mark J. Wejksznar, D.E.
Northeast Regional Air Quality Program Manager
Air Quality Program


Sean L. Robbins
Assistant Counsel



Mike Ioff/R3/USEPA/US
02/23/2006 02:12 PM

To "Matcho, David" <dmatcho@state.pa.us>
cc "Frederick, Norman" <nfrederick@state.pa.us>
bcc Mike Ioff/R3/USEPA/US
Subject RE: PPL MARTINS CREEK TV-48-00011 CAM Requirements

For Follow Up: Urgent Priority

Hi, David:

This is in response to the questions posted in your e-mail message of 02/06/2006 concerning CAM requirements for the PPL Martins Creek TV renewal.

1. Regarding the anticipated closure of Units 1 & 2 in 2007, there is no such thing "as a temporary means of compliance" suggested by the company in lieu of developing a set of standard parameter ranges. Neither EPA nor PADEP may exempt the affected emission units from compliance with 40 CFR Part 64 based on the anticipated closure of those units in the future. In addition, we can not agree with the company's assertion that the effort to develop a set of standard parameter ranges would take years to complete. We expect that PPL will address the long overdue CAM issues expeditiously so that the overdue Title V permit renewal may be issued.

2. The company intends to use a historical data containing the records of voltage, current, and spark rate readings to establish indicator ranges. It should be noted that proper indicator ranges for the secondary voltage and current shall be derived from the actual stack test performed under various load conditions. Historical monitoring data are useful or even necessary for establishing indicator ranges, but only **in addition** to parameter data collected during compliance tests,.

3. The parameter range for the Secondary Voltage, as proposed, is from 0 kV to 40 kV. The chosen range does not seem to be an acceptable proposition as it encompasses the ESP's performance levels ranging from zero to full. Similarly, the proposed parameter range for the Secondary Current is too broadly defined to serve as a reliable indicator of the ESP performance.

4. The company asserts that taking readings every quarter hour by the company personnel, as required by Part 64, is not practical and unduly burdensome. We assume this notion is based on the presumption that the readings are to be taken directly from the secondary voltmeters and ammeters by an observer. The digital meters and data acquisition and handling systems with the capabilities of continuous recording and reduction of the data are available to ease this burden. Those systems are designed to provide automatic display, storage and analysis of data from instruments with communications interface.

5. It is understood that the Units 1 & 2 (dry-bottom, front wall-fired, 1,815 MMBtu/hr each, utility boilers constructed in 1954 and 1956 respectively) are approaching the end of their useful life and a replacement of their outdated electrical instrumentation may not be a desirable option for the permittee. We are offering here the following approach which may provide a relief to PPL by eliminating the requirement to obtain the secondary voltage and current readings every quarter hour. As per 40 CFR Part 64, §64.3 (b)(4)(iii), for the pollutant-specific emission units with the potential to emit **(after control)** less than 100 t/y of the pollutant, the frequency of data collection may be considerably less than every quarter hour – ultimately once per a 24-hour period. You have indicated that PPL performed a trending analysis when opacity was

approaching 17% and that the tests indicated that PM concentrations were considerably lower than 0.1 lb/MMBtu. (0.001 – 0.005 lb/MMBtu as per Kathleen Maylath of PPL.) It appears that PPL may be in a position to accept a practically enforceable limit on potential emissions equal or below the 100 t/y threshold level at each of its Units 1 & 2 by operating ESPs at their full capturing efficiency and accepting, if necessary, realistic limits on operating hours and max heat input per annum.

6. Attached please find an EPA website with Supplement #2 to the CAM Technical Guidance Document which includes an example of CAM Plan for an ESP controlling PM emissions from three coal-fired boilers. (See pages A.25-1 through A.25-4.) It should help PPL to develop an acceptable CAM Plan. Here is the website:

<http://www.epa.gov/ttn/emc/cam/camsupp2.pdf>

Thank you,

Michael Ioff, P.E.

U.S. EPA Region III

Air Protection Division

Permits and Technical Assessment Branch

Phone: (215)814-2166 E-mail: ioff.mike@epa.gov

"Matcho, David" <dmatcho@state.pa.us>



"Matcho, David"

<dmatcho@state.pa.us>

02/06/2006 11:53 AM

To Mike Ioff/R3/USEPA/US@EPA

cc "Frederick, Norman" <nfrederick@state.pa.us>

Subject RE: PPL MARTINS CREEK TV-48-00011 CAM Requirements

Mike:

PPL has submitted a third CAM plan December 28, 2005. I have enclosed some background information regarding PPL's TV operating permit and issues with meeting CAM requirements.

According to the requirements in the current TV operating permit, PPL Martins Creek verifies compliance with the 0.1 Lb/MMbtu particulate matter limitation through a number of conditions including fuel restrictions, testing requirements (heating value and ash content of coal), recordkeeping requirements (including emission calculations), elective restrictions (settlement agreement of 10/2003 that includes annual stack testing for PM) and additional requirements (ESP maintenance plan).

According to PPL, it would be difficult to obtain a set of standard parameter ranges for transformer/rectifier voltage, current, and spark rate over all operating load conditions and process variables. PPL claims that variability in heating value/ash content of coal and in the number of Transformer-Rectifier sets operating within the ESPs make it difficult to establish a set of standard parameter ranges. PPL also plans to eliminate the sources (Units 1 and 2) in the year 2007. They also argue against establishing these ranges since it would take years to complete and is not reasonable, given the time frame for eliminating the sources.

The company should, however, have a history of records of voltage, current

and spark rate readings in accordance with the ESP maintenance plan (from October 2003 agreement) they are required to follow as a part of their current operating permit. Included in the plan are conditions requiring PPL to take ESP transformer/rectifier readings twice per day and with each occurrence of opacity alarms from the control room. This history should include readings when opacity is below, equal to or exceeding 20%. The company therefore should have a basis of data for maintaining the ESP units within operating parameter ranges while maintaining compliance with operating permit limits for opacity and particulate matter. Also, as part of the ESP maintenance plan, the operations staff perform a series of weekly and monthly maintenance checks of the ESPs to assure proper operation of the devices.

The latest CAM plan submitted proposes, as a temporary means of compliance (until the sources are shut down in 2007), the following approach to monitoring the Electrostatic Precipitators:

- 1) PPL will monitor the transformer / rectifier (T/R) sets.
- 2) Secondary Voltage and Secondary Current will be monitored.
- 3) Parameter ranges for Secondary Voltage will be 0-40 kV and Secondary Current will be 90-900 mA.
- 4) T/R parameters will be checked two (2) times per day and with each opacity reading outside of acceptable limits.
- 5) Verification of operational status (QC/QA) of ESP's will be through ESP maintenance plan as part of 10/2003 agreement.
- 6) If more than three (3) T/R sets on either source are inoperable, a series of investigative steps will be conducted to troubleshoot and correct the problem. If the problem cannot be located, the source will be operated at reduced unit load (to keep opacity and pm levels below limits) until the problem is corrected.

PPL claims that it is not practical to have personnel at ESPs taking readings every quarter hour (to obtain an hourly average of 4 readings) to establish ESP average efficiency. I assume this has to do with physical location of meters, manpower requirements, etc. Should the company install a continuous monitoring device for ESP parameters?(voltage, current, spark rate, etc.) If so, what sort of device ?

PPL claims to perform trending analysis when opacity hits 17%. I assume this is to give them a "heads up" for any potential to exceed the opacity limit. PPL claims that annual stack testing has indicated particulate matter concentrations to be considerably less than 0.1 Lb./MMBtu. I spoke with Kathy Maylath at PPL who claimed stack test results for PM are on the order of .001 to .005 Lb/MMBtu, although she could not officially verify these numbers.

I have enclosed CAM requirements I have derived from PPL Martins Creek CAM plan for your review.

Mike, I look forward to any additional thoughts and suggestions you will have.

Thanks!

Dave Matcho

-----Original Message-----

From: Ioff.Mike@epamail.epa.gov [mailto:Ioff.Mike@epamail.epa.gov]
Sent: Tuesday, June 07, 2005 10:09 AM

To: dmatcho@state.pa.us
Cc: Anderson.Kathleen@epamail.epa.gov
Subject: Fw: PPL MARTINS CREEK TV-48-00011 CAM Requirements

Hi, David:

As you may remember, in my March 3, 2005, e-mail message I have had briefly outlined what should be expected in an acceptable CAM plan and provided a link to an EPA CAM website. I have also referred to EPA's implementation document and a proposed CAM Protocol for an ESP controlling PM from a Coal-Fired Boilers as good sources the company would need to familiarize itself with. A revised CAM plan resubmitted by the company to PADEP is clearly demonstrates that the company was either not able to access the referenced documents or decided to ignore them. As there is no getting away from the developing an acceptable CAM plan, I'm attaching again EPA's websites directly related to the matter. It should be noted that the whole approach toward the Compliance Assurance Monitoring chosen by the company is not acceptable for the following reasons:

1) There is no reliable correlation between the observed opacity and the PM concentration in the exhaust stream and, as a result, any COM system may only demonstrate compliance of the source with the opacity limit. Any COM reading indicating that the opacity is less than the permitted limit (20% here) doesn't necessarily mean that compliance with the applicable PM emission limit (less than 0.1 lb per MMBtu here) set forth in the permit is assured. The principal reason for establishing a CAM plan is to provide the owner or operator of the source with an additional flexibility by allowing them to assure compliance with the permitted emission limit by monitoring the appropriate set of the critical operating parameters of the emission unit/control system (ESP here) instead of requiring the source to install a more expensive appropriate CEM system. Should, for instance, compliance with the permitted PM emission limit be monitored by a dedicated PM CEM system, no CAM plan would have been required at all.

2) As the purpose of any CAM plan is to provide a reasonable assurance of compliance with emission limitations, continuous monitoring of the critical operating indicators (parameters) of the emission unit/control system, indicating any excursions from those ranges, and responding to the data are of the paramount importance. A CAM plan must establish specific values of the indicator ranges (or detailed procedures to be used in establishing those ranges) which should be derived from the stack tests under various load conditions and operating scenarios of the source.

3.) In light of the above, it should be clear that a CAM plan for PM shall not use as a trigger point the exceedance of the 20% opacity limit. Rather the whole set on indicator ranges set forth for each ESP shall be monitored with the appropriate frequencies. For instance, for large pollutant-specific emission units (PSEUs) a CAM plan would require the owner or operator to collect four or more data values equally spaced over each hour and average the values over the applicable averaging period, for each parameter monitored [§64.3(b)(4)(ii)].

4) Requirements for CAM submittals are addressed in §64.4 and shall be satisfied when the plan is submitted to the permitting authority. More information could be found in Chapter 2 and Appendix A of the EPA CAM Technical Guidance Document.

Please be advised that EPA would object to the proposed TV-48-00011

permit as written unless an acceptable CAM plan is developed and incorporated into the permit. Should you wish to discuss the matter further, you may reach me either by e-mail or by phone as indicated below.

<http://www.epa.gov/ttn/emc/cam.html>

<http://www.epa.gov/ttn/emc/cam/draftcamappb.pdf>

Michael Ioff, P.E.

U.S. EPA Region III

Air Protection Division

Permits and Technical Assessment Branch

Phone: (215)814-2166 E-mail: ioff.mike@epa.gov



CAMreq.doc



Mike Ioff/R3/USEPA/US
12/21/2005 09:47 AM

To "Garner, James" <jagarner@state.pa.us>
cc "Matcho, David" <dmatcho@state.pa.us>
bcc Mike Ioff/R3/USEPA/US
Subject Re: Title V Operating Permit #40-00005

Hi, James:

This is in response to your two e-mail messages related to subject permit.

1. "12-month rolling summation"

The restriction on a number of operating hours expressed in the original permit as a number of hours per year was set incorrectly. As EPA policy concerning practical enforceability has not changed, this restriction should have been, as you correctly suggested, expressed as a number of operating hours per 12-month rolling summation. Should Hunlock Creek Energy Ventures continue to insist on reverting to the original terms, you may want to explain to them that EPA would not recognize the original restriction as being practically enforceable with the all of the negative consequences to follow. When you mentioned in your e-mail message that the original permit condition was "approved" by EPA, please keep in mind that our review (sometimes cursory) of selected permits doesn't constitute EPA's approval of the permit. However, we do retain the right to object a permit regardless of its status, i.e., being drafted or already issued in final.

2. "5% opacity versus 19% opacity."

I'm not sure that we are on the same page here. If compliance with the opacity standard is assured by employing a COMS, then Part 64 doesn't apply including its requirements concerning ranges and excursions. However, should their COMS being used as one of the performance indicators assuring compliance with their PM limit, then it is an entirely different story. In this case, replacing a 5% opacity excursion limit with a 19% opacity excursion limit is totally inappropriate. Moreover, the 5% opacity excursion limit may not be set arbitrarily as it appears to be the case here, but should be determined from the correlation curves based on the stack tests performed under various load conditions and for various fuels. As this particular permit was cursory reviewed in 1997 for the phase II Acid Rain material only, I suggest you to take another look if the CAM plan does satisfy the full spectrum of the applicable requirements set forth in Part 64. You may want to tackle the issue by using the Portland Generating Station CAM plan as an example. As you are aware, during the past few months, both you and I spent an appreciable amount of time in ironing out details in the Portland CAM plan and I feel strongly that we should be able to recoup certain benefits from our recent mutual efforts. Should you face any difficulties in trying to incorporate the applicable CAM requirements into this issued permit, we can talk about these issues further.

Thank you,
Michael Ioff, P.E.
U.S. EPA Region III
Air Protection Division
Permits and Technical Assessment Branch
Phone: (215)814-2166 E-mail: ioff.mike@epa.gov

P.S. I copied this e-mail message to David Matcho as he has a similar issue at hand, i.e., Martin Creek Station with a proposed CAM plan taking a half of a page. I thought that he may find our conversation helpful.

"Garner, James" <jagarner@state.pa.us>



"Garner, James"
<jagarner@state.pa.us>
12/16/2005 03:37 PM

To Mike Ioff/R3/USEPA/US@EPA
cc
Subject Title V Operating Permit #40-00005



Mike,

Again, on that permit I sent you earlier, there is an operating hour limitation of 1850 hours perm year place on Source 104 (Section D, page 31, condition #005). In the original operating permit (which I believe was reviewed by EPA before issuance) there was no mention of the 12-month rolling average. I added that to the condition when I rolled it into the Title V permit because when we were initially issuing these permits back in the nineties EPA would always insist that that wording be added to such conditions. Jeff Steeber at Hunlock Creek Energy Ventures wants the wording removed. I have no problem with this if that is the wording of the original condition as approved by EPA. I'm just checking with you to see if EPA's original policy has since changed. Let me know.

Thanks,

James Garner
DEP - NERO Bureau of Air Quality
Facilities Permitting Section



"Garner, James"
<jagarner@state.pa.us>
12/16/2005 03:37 PM

To Mike Ioff/R3/USEPA/US@EPA
cc
bcc

Subject Title V Operating Permit #40-00005

Mike,

Again, on that permit I sent you earlier, there is an operating hour limitation of 1850 hours per year place on Source 104 (Section D, page 31, condition #005). In the original operating permit (which I believe was reviewed by EPA before issuance) there was no mention of the 12-month rolling **average**. I added that to the condition when I rolled it into the Title V permit because when we were initially issuing these permits back in the nineties EPA would always insist that that wording be added to such conditions. Jeff Steeber at Hunlock Creek Energy Ventures wants the wording removed. I have no problem with this if that is the wording of the original condition as approved by EPA. I'm just checking with you to see if EPA's original policy has since changed. Let me know.

PERIOD

Thanks,

James Garner
DEP - NERO Bureau of Air Quality
Facilities Permitting Section

1897



"Garner, James"
<jagarner@state.pa.us>
12/16/2005 02:40 PM

To Mike Ioff/R3/USEPA/US@EPA
cc
bcc
Subject Hunlock Creek Title V #40-00005

Hi Mike,

Jeff Steeber at Hunlock Creek has asked me to administratively amend a condition in their permit concerning the CAM plan. Specifically in Section D, page 26 in condition #29 for Source 031 (see attached copy of the permit), the excursion range for opacity measured by their Continuous Opacity Monitor in the current permit is 5%. Mr. Steeber wants it raised to 19%. As Hunlock Creek did not propose an excursion range in their CAM plan, I used the range from a CAM plan for another power generating facility as an example. I have no problem amending the number, but I felt I should get the input of someone at EPA on this matter. Please let me know what you think of this.

Thanks,

James Garner
DEP - NERO Bureau of Air Quality



Facilities Permitting Section 40-00005 Issued_v1.pdf



"Garner, James"
<jagarner@state.pa.us>
05/24/2006 03:12 PM

To Mike Ioff/R3/USEPA/US@EPA
cc "Robbins, Sean" <serobbins@state.pa.us>, "Frederick, Norman" <nfrederick@state.pa.us>
bcc
Subject Hunlock Creek Appeal of Title V #40-00005 issued October 30, 2005

Mike,

I response to an appeal from Hunlock Creek Energy Ventures, I am currently revising their Title V Operating Permit. To summarize Hunlock's issues:

(a) With regard to the Title V Operating Permit:

(1) Hunlock Creek objected to the inclusion of "based upon a 12-month rolling summation" to the operating hour limitation on the Combustion Turbine (Source CT1; the condition in the original Plan Approval issued for this source did not include such wording). DEP Central Office agrees that the 12-month summation is the proper limitation, and the requirement remains unchanged.

(2) Hunlock Creek objected to the 5% opacity limit to determine an excursion for CAM. They requested a 19% excursion limit, which both the Department and EPA deemed to lenient. In response to our request, Hunlock Creek has submitted an alternate operating parameter to monitor the ESPs for CAM. They have proposed monitoring the secondary voltage and current in each ESP and determining the total power from that manually. I have modified the CAM requirement language under Source 031 to reflect this. Hunlock Creek is proposing monitoring once per weekday.

(b) With regard to the attached Title IV Acid Rain Operating Permit:

(1) The Acid Rain Permit included a NOx Emission limit of 0.34 Lbs/MMBtu. Hunlock contested this limit, insisting that it be replaced by the 0.69 Lbs/MMBtu NOx RACT limit. Because neither EPA nor the Department can find a record of the submittal of a 40 CFR Part 76/77 NOx Plan, the Department has agreed to remove the 0.34 limit. The 0.69 limit can be found in Section D, Source 031 of the draft permit.

(2) Hunlock had objections about the wording of the NOx Compliance Plan submittal language in the Acid Rain Permit. Because this wording is taken directly from 40 CFR Part 76, the Department has refused to alter the wording.

Attached is a copy of the revised 40-00005 and the revised Acid Rain Permit. Please submit any comments you may have on the new CAM to me by email or call (570) 826-2343.

James Garner
DEP - NERO Bureau of Air Quality
Facilities Permitting Section



Appealed 40-00005.pdf



Appealed Hunlock Creek Acid Permit Draft.doc



Mike Ioff/R3/USEPA/US
12/21/2005 09:47 AM

To "Garner, James" <jagarner@state.pa.us>
cc "Matcho, David" <dmatcho@state.pa.us>
bcc Mike Ioff/R3/USEPA/US
Subject Re: Title V Operating Permit #40-00005

For Follow Up: Normal Priority

Hi, James:

This is in response to your two e-mail messages related to subject permit.

1. "12-month rolling summation"

The restriction on a number of operating hours expressed in the original permit as a number of hours per year was set incorrectly. As EPA policy concerning practical enforceability has not changed, this restriction should have been, as you correctly suggested, expressed as a number of operating hours per 12-month rolling summation. Should Hunlock Creek Energy Ventures continue to insist on reverting to the original terms, you may want to explain to them that EPA would not recognize the original restriction as being practically enforceable with all of the negative consequences to follow. When you mentioned in your e-mail message that the original permit condition was "approved" by EPA, please keep in mind that our review (sometimes cursory) of selected permits doesn't constitute EPA's approval of the permit. However, we do retain the right to object a permit regardless of its status, i.e., being drafted or already issued in final.

2. "5% opacity versus 19% opacity."

I'm not sure that we are on the same page here. If compliance with the opacity standard is assured by employing a COMS, then Part 64 doesn't apply including its requirements concerning ranges and excursions. However, should their COMS being used as one of the performance indicators assuring compliance with their PM limit, then it is an entirely different story. In this case, replacing a 5% opacity excursion limit with a 19% opacity excursion limit is totally inappropriate. Moreover, the 5% opacity excursion limit may not be set arbitrarily as it appears to be the case here, but should be determined from the correlation curves based on the stack tests performed under various load conditions and for various fuels. As this particular permit was cursory reviewed in 1997 for the phase II Acid Rain material only, I suggest you to take another look if the CAM plan does satisfy the full spectrum of the applicable requirements set forth in Part 64. You may want to tackle the issue by using the Portland Generating Station CAM plan as an example. As you are aware, during the past few months, both you and I spent an appreciable amount of time in ironing out details in the Portland CAM plan and I feel strongly that we should be able to recoup certain benefits from our recent mutual efforts. Should you face any difficulties in trying to incorporate the applicable CAM requirements into this issued permit, we can talk about these issues further.

Thank you,
Michael Ioff, P.E.
U.S. EPA Region III
Air Protection Division
Permits and Technical Assessment Branch
Phone: (215)814-2166 E-mail: ioff.mike@epa.gov

P.S. I copied this e-mail message to David Matcho as he has a similar issue at hand, i.e., Martin Creek Station with a proposed CAM plan taking a half of a page. I thought that he may find our conversation helpful.

"Garner, James" <jagarner@state.pa.us>



"Garner, James"
<jagarner@state.pa.us>
12/16/2005 03:37 PM

To Mike Ioff/R3/USEPA/US@EPA
cc



Subject Title V Operating Permit #40-00005

Mike,

Again, on that permit I sent you earlier, there is an operating hour limitation of 1850 hours perm year place on Source 104 (Section D, page 31, condition #005). In the original operating permit (which I believe was reviewed by EPA before issuance) there was no mention of the 12-month rolling average. I added that to the condition when I rolled it into the Title V permit because when we were initially issuing these permits back in the nineties EPA would always insist that that wording be added to such conditions. Jeff Steeber at Hunlock Creek Energy Ventures wants the wording removed. I have no problem with this if that is the wording of the original condition as approved by EPA. I'm just checking with you to see if EPA's original policy has since changed. Let me know.

Thanks,

James Garner
DEP - NERO Bureau of Air Quality
Facilities Permitting Section



"Garner, James"
<jagarner@state.pa.us>
01/25/2006 02:02 PM

To: Mike Ioff/R3/USEPA/US@EPA
cc
bcc
Subject: FW: Changes to Draft from EPA

For Follow Up:	📌 Urgent Priority
History:	📧 This message has been replied to.

Hi Mike,

Attached are Reliant's latest comments about the Title V draft. Most of it is not an issue. With regard to their response to Comment #6, I'm currently trying to determine what to do about the RFD for SynFuel Combustion include in the Title V Renewal Application. With regards to the response to Comment #8 (the CAM excursion limit of 5% opacity), we're letting Reliant propose a voltage range for the ESPs as an alternative parameter. Hunlock Creek Energy Ventures (40-00005) had this same issue and are currently developing a voltage range to replace the 5% opacity range.

I'm also trying to find out who to contact at EPA Region III concerning Title IV Acid Rain Permits. I'm trying to find copies of the NOx Compliance Plan Applications sent to EPA by UGI (now called Hunlock Creek) back in 1999. Can you help with this?

Thanks,

James Garner
DEP - NERO Bureau of Air Quality
Facilities Permitting Section

-----Original Message-----

From: Roland, Eric S. [mailto:ERoland@reliant.com]
Sent: Friday, January 06, 2006 3:50 PM
To: Garner, James
Cc: Brisini, Vincent J; McKenzie, Timothy E; Capobianco, Frank N
Subject: RE: Changes to Draft from EPA

James,

Attached are the Reliant Comments to your 12/29/05 Version of the Portland Proposed Title V Permit. Vince and Tim are going to try and set up a conference call with you and Tom, to discuss the Malfunction language.

If you have any questions please feel free to give Tim or I a call.

Regards,

Eric Roland

-----Original Message-----

From: Garner, James [mailto:jagarner@state.pa.us]
Sent: Thursday, December 29, 2005 10:35 AM

To: Roland, Eric S.; Ioff, Mike (E-mail)
Cc: Frederick, Norman
Subject: RE: Changes to Draft from EPA

Eric Roland & Mike Ioff

Attached are my comments on Reliant Energy's requested changes (submitted 12/28) and a revised Title V Operating Permit draft.

P.S. to Norm Frederick: Tom Because it will be necessary to wait for comments from Tom DiLazaro & Bill Nuver, it won't be possible to issue the permit by Dec. 30th. I am now shooting for an issuance date no later than Jan. 31st.

-----Original Message-----

From: Roland, Eric S. [mailto:ERoland@reliant.com]
Sent: Wednesday, December 28, 2005 1:06 PM
To: Garner, James
Cc: McKenzie, Timothy E; Brisini, Vincent J; Capobianco, Frank N
Subject: RE: Changes to Draft from EPA

James,

Thank you for addressing our comments. Attached are a few more minor changes that need to be addressed, based on the 12/22/05 (3:23 pm draft version). In regards to the malfunction notification language, we will contact Tom DiLazaro, after the holidays, to discuss the language that we have provided to you during the comment period. I have included the same language in the attached comments, and also included a statement in that specific comment that we will be contacting Tom to discuss in further detail.

I will submit a hard copy of these comments under cover letter for your files and ours.

If you have any questions, I'll be in the rest of today and tomorrow, and will be off from 12/30/05 through 1/2/05.

Happy New Year,

Eric Roland

-----Original Message-----

From: Garner, James [mailto:jagarner@state.pa.us]
Sent: Thursday, December 22, 2005 3:23 PM
To: Roland, Eric S.
Subject: Changes to Draft from EPA

Eric,

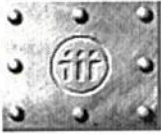
Mike Ioff let me know that 40 CFR Part 63, Subpart YYYYYY should apply to all of the dual-fuel Combustion Turbines, so attached is a new copy of the draft with "Group 5 - Combustion Turbines" added to Section E. As usual, if you have any questions or comment, e-mail or call me at (570) 826-2343.

Have a Happy Holiday,

James Garner
DEP - NERO Bureau of Air Quality
Facilities Permitting Section



Response to PADEP 12-29-05 Proposed Portland Title V Permit.doc



Mike Ioff/R3/USEPA/US
01/26/2006 11:15 AM

To "Garner, James" <jagarner@state.pa.us>
cc
bcc Mike Ioff/R3/USEPA/US@EPA
Subject Re: FW: Changes to Draft from EPA

Hi, James:

It is my understanding that the Reliant CAM excursion limit of 5% opacity set forth in the version of the draft dated 12/21/2005, was derived from the correlation charts developed by the company and based on their utilization of the Series 7000 PM measurement method. We have no objections to a company's desire to switch to monitoring of alternative (recommended) primary Performance Indicators to monitor ESP performance. However, proposed monitoring of a voltage range **alone**, as was indicated in your e-mail message, is not sufficient for the following reasons:

The secondary voltage (d.c.) **and current** at ESP's are recommended for use as primary indicators of ESP performance. When the values of the secondary voltage and current are obtained, their product is used to determine the secondary corona power at the ESP. When compared with the primary power delivered to the primary low-voltage (a.c.) side of the transformer, the secondary power input for each field and for the total ESP indicates how much work is being done to collect the particulates and just how well each of the sections is working. For many ESP applications, the ratio of secondary power to the primary power input is typically found to be between 0.70 - 0.75. In absence of the secondary current measurements at the T-R sets, the secondary corona power can not be determined and no conclusion of ESP performance could be formed. The proper indicator ranges for the secondary voltage and current should be derived from the actual stack test performed under proper load conditions and submitted to PADEP for evaluation and approval.

Regarding the Hunlock facility all of the above applies as well. You may remember my e-mail message to you dated 12/21/2005 where I have discussed the issue concerning 5% opacity limit. Concerning their NOx Compliance Plan Application, the answer is simple - we do not keep applications on file after the permit is issued. Should you have any specific questions concerning Title IV Acid Rain Permits, you may direct them to me.

Thank you,
Michael Ioff, P.E.
U.S. EPA Region III
Air Protection Division
Permits and Technical Assessment Branch
Phone: (215)814-2166 E-mail: ioff.mike@epa.gov

"Garner, James" <jagarner@state.pa.us>



"Garner, James"
<jagarner@state.pa.us>

To Mike Ioff/R3/USEPA/US@EPA



"Garner, James"
<jagarner@state.pa.us>
06/07/2006 03:47 PM

To Mike Ioff/R3/USEPA/US@EPA
cc
bcc

Subject RE: Hunlock Creek Appeal of Title V #40-00005 issued
October 30, 2005

Mike,

I've e-mailed your comments to Jeff Steeber at Hunlock, and I'm currently waiting for him to get back to me on the CAM monitoring interval for voltage.

With regards to comment (c), I've checked Hunlocks's RACT folder #45-0005 and found that an extension to a RACT Plan Approval 45-0005A was issued on 12/1994 and expired in 1995. As far as I can tell 45-0005A never became an operating permit. A renewal of RACT Operating Permit #45-0005 was issued in 1997 and includes none of the conditions from 0005A. I assume whatever changes were being made at the facility requiring a modification of the RACT permit never manifested, and the facility continued to operate under the original RACT permit. As the most current version of the RACT limits NOx to only 0.69 LBs/MMBtu, we see no reason to change it to 0.5. Is the 45-0005A you're looking at an Operating Permit or a Plan Approval?

I've added the conditions from the NOx Budgeting Allowance permit to the Title V per comment (d).

Attached is a draft of the updated permit for your perusal.

Thanks,

James Garner
DEP - NERO Bureau of Air Quality
Facilities Permitting Section

-----Original Message-----

From: Ioff.Mike@epamail.epa.gov [mailto:Ioff.Mike@epamail.epa.gov]
Sent: Friday, May 26, 2006 12:03 PM
To: Garner, James
Cc: Frederick, Norman; Robbins, Sean
Subject: Re: Hunlock Creek Appeal of Title V #40-00005 issued October 30, 2005

Hi, James:

Here is what I have to say regarding the issues posted in your e-mail message.

(a) Title V permit:

(1) Concerning the enforceability as a practical matter, a concept utilizing a 12 month rolling period is neither new nor optional. For example, the original permit for the combustion turbine issued by PADEP to this facility on 04/05/2000 calls for a NOx emission limit of 37.9 ton per year with a specific notation that this limit is based on a 12 month rolling sum. (Plan Approval No. 40-328-003, Condition 12.) Region III appreciates your decision to retain the limit on hours of operation as written in the Title V permit renewal issued on 10/31/2005.

(2) The proposed use of the secondary voltage and secondary current is an acceptable option in developing a CAM plan for an ESP. However, the proposed frequency of monitoring and recording once per weekday doesn't comply with the requirements set forth at 40 CFR Part 64, §64.3

(b)(4)(ii). To comply with the rule, the values of the ESP Secondary Corona Power (a sum of the products of secondary voltage and secondary current readings taken at each field of the ESP) shall be obtained and recorded every quarter hour. This requirement is usually fulfilled by utilizing modern monitoring systems. Such systems consist of digital voltmeters and ammeters with communications interface and are capable of continuously recording and reducing the data. In addition, the appropriate ranges for the Secondary Corona Power shall be established during stack tests and incorporated into the CAM plan. Examples of acceptable CAM plans for ESPs controlling coal fired boilers may be found on a website: <http://www.epa.gov/ttn/emc/cam/draftcamappb.pdf>

(b) Title IV Acid Rain Permit:

I agree with your decision to remove a NOx limit from the Acid Rain Permit. Boiler No. 6 appears not to be an affected unit under 40 CFR Part 76. (You may be in a better position to verify this as I have no information concerning the unit specific design which largely defines applicability of Part 76.)

(c) You have incorporated a RACT NOx limit of 0.69 Lb/MMBtu into the TVOP, Sections D and G, Source 031, as an applicable requirement. (This limit is also incorporated into the original Title V permit issued on 02/12/1998.) However, the RACT permit No. 40-0005A issued by PADEP on 12/20/1994, clearly states that:

(8) "Boiler No. 6 shall comply with the following NOx RACT emission rate:

(a) 0.5 lb/MMBtu heat input - 30 day rolling average." (I can fax you a copy of this permit if necessary.)

Would you please explain where does this 0.69 number come from?

(d) In addition, Boiler No. 6 is an affected source under Pennsylvania's NOx Budget Trading Program set forth in Title 25. Section 145. Please make sure that this section is listed in the permit as an applicable requirement.

Thank you,
Michael Ioff, P.E.
U.S. EPA Region III
Air Protection Division
Permits and Technical Assessment Branch
Phone: (215)814-2166 E-mail: ioff.mike@epa.gov

"Garner, James"
<jagarner@state.pa.us>

05/24/2006 03:12
PM

Mike Ioff/R3/USEPA/US@EPA

"Robbins, Sean"
<serobbins@state.pa.us>,
"Frederick, Norman"
<nfrederick@state.pa.us>

Subject
Hunlock Creek Appeal of Title V

To
cc

Mike,

I response to an appeal from Hunlock Creek Energy Ventures, I am currently revising their Title V Operating Permit. To summarize Hunlock's issues:

(a) With regard to the Title V Operating Permit:

(1) Hunlock Creek objected to the inclusion of "based upon a 12-month rolling summation" to the operating hour limitation on the Combustion Turbine (Source CT1; the condition in the original Plan Approval issued for this source did not include such wording). DEP Central Office agrees that the 12-month summation is the proper limitation, and the requirement remains unchanged.

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(1) The Acid Rain Permit included a NOx Emission limit of 0.34 Lbs/MMBtu. Hunlock contested this limit, insisting that it be replaced by the 0.69 Lbs/MMBtu NOx RACT limit. Because neither EPA nor the Department can find a record of the submittal of a 40 CFR Part 76/77 NOx Plan, the Department has agreed to remove the 0.34 limit. The 0.69 limit can be found in Section D, Source 031 of the draft permit.

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James Garner
DEP - NERO Bureau of Air Quality
Facilities Permitting Section

(See attached file: Appealed 40-00005.pdf) (See attached file: Appealed Hunlock Creek Acid Permit Draft.doc)



Unoffical TV40-00005.pdf



"Garner, James"
<jagarner@state.pa.us>
06/07/2006 03:47 PM

To: Mike Ioff/R3/USEPA/US@EPA
cc
bcc
Subject: RE: Hunlock Creek Appeal of Title V #40-00005 issued
October 30, 2005

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DEP - NERO Bureau of Air Quality
Facilities Permitting Section

-----Original Message-----

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Sent: Friday, May 26, 2006 12:03 PM
To: Garner, James
Cc: Frederick, Norman; Robbins, Sean
Subject: Re: Hunlock Creek Appeal of Title V #40-00005 issued October 30, 2005

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Would you please explain where does this 0.69 number come from?

(d) In addition, Boiler No. 6 is an affected source under Pennsylvania's NOx Budget Trading Program set forth in Title 25, Section 145. Please make sure that this section is listed in the permit as an applicable requirement.

Thank you,
Michael Ioff, P.E.
U.S. EPA Region III
Air Protection Division
Permits and Technical Assessment Branch
Phone: (215)814-2166 E-mail: ioff.mike@epa.gov

"Garner, James"
<jagarner@state.pa.us>

05/24/2006 03:12
PM

Mike Ioff/R3/USEPA/US@EPA

"Robbins, Sean"
<serobbins@state.pa.us>,
"Frederick, Norman"
<nfrederick@state.pa.us>

Subject
Hunlock Creek Appeal of Title V

To

cc

Mike,

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James Garner
DEP - NERO Bureau of Air Quality
Facilities Permitting Section

(See attached file: Appealed 40-00005.pdf) (See attached file: Appealed Hunlock Creek Acid Permit Draft.doc)



Mike Ioff/R3/USEPA/US
02/06/2006 09:16 AM

To "Garner, James" <jagarner@state.pa.us>
cc
bcc
Subject Re: Acid Rain Question 

James:

I have re-checked our files and found the signed application for a Phase II Acid Rain permit submitted by UGI Utilities, Inc. and dated Dec 01, 1997. I am going to fax it to you this morning to fax No: 570-826-2357.

Take care,

Mike.

"Garner, James" <jagarner@state.pa.us>



"Garner, James"
<jagarner@state.pa.us>
02/03/2006 12:17 PM

To Mike Ioff/R3/USEPA/US@EPA
cc
Subject Acid Rain Question

Mike,

Hunlock Creek Energy Ventures (formerly UGI) is currently appealing their Title V Operating Permit because of the NOx Limit in the attached Title IV Acid Rain Permit. We've been trying to find the copies of the applications submitted by UGI to DEP Central Office and EPA, but have been unable to find them in our files in the Northeast or in our Central Office. Does EPA retain copies of these applications, and if so can you fax or mail copies to us? Any help is greatly appreciated.

Thanks,

James Garner
DEP - NERO Bureau of Air Quality
Facilities Permitting Section



FAX TRANSMISSION

US Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

To: *JAMES GARNER* Date: *02/06/06*
Fax #: *570-826-2357* Pages: *5*, including this cover sheet.

From: *MIKE IOFF*

Subject: *UGI APPLICATION OF 12/01/97*
FOR A PHASE II ACID RAIN PERMIT

COMMENTS:

00 00 00
70

2000-2000
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Central

UGI Utilities, Inc.
Hanover Industrial Estates
400 Stewart Road
Post Office Box 3200
Wilkes Barre, PA 18773-3200

December 8, 1998

(717) 819-1212 Telephone

CERTIFIED MAIL NO. P 180 476 583

US EPA Region III
841 Chestnut Street
Philadelphia, PA 19107

Dear Sir/Madam,

In accordance with the requirements of Section 127.462 of Chapter 127 of Article III of the Rules and Regulations of the Department of Environmental Protection, UGI Utilities, Inc. is hereby providing you with notification that application to the Department for a minor modification to our Air Quality Title V Operating Permit#40-0006 has been submitted. The proposed minor modification consists of incorporating into the operating permit the ability to burn bituminous coal and petroleum coke in the No. 6 Boiler at UGI Utilities, Inc. Hunlock Power Station located in Hunlock Township, Luzerne County, PA.

Presently the company is permitted to burn anthracite silt, anthracite coal and No. 2 fuel oil. The proposed minor modification will not change or affect any conditions of the previously issued Title V Permit. It will not change any existing monitoring, reporting or recordkeeping requirements as stated in the permit. The proposed minor operating permit modification will not cause UGI Utilities, Inc. to exceed the required emission standards.

Should you wish to comment on this proposed operating permit modification, you may wish to do so within 21 days of your receipt of this letter by sending your comments in writing to Mr. Michael Safko, Chief of Title V Facilities, Air Quality Program, PA Department of Environmental Protection, 2 Public Square, Wilkes-Barre, PA 18711.

If you should have any questions, please contact me at (717) 830-1267.

Sincerely.

Jeffrey T. Steeber

Jeffrey T. Steeber
Engineer II
Hunlock Power Station

RECEIVED

DEC 17 1998

Air Protection Division (SAP11)

JTS:chet



Fw: Upcoming EPA inspection
James Hagedorn to: jsteeber
Cc: mwejkszner

05/14/2012 08:51 AM

PROTECTION AGENCY

UNITED STATES ENVIRONMENTAL

REGION III

1650 Arch Street
Philadelphia, Pennsylvania

19103-2029

May 14, 2012

Sent via email

Dear Mr. Steeber:

The US EPA will be conducting an inspection of the UGI (Hunlock Power Station) plant in Wilkes Barre , Pennsylvania for air emission issues on Tuesday, June 12, 2012. It is anticipated that this inspection will begin around 9:00 am. This inspection will examine all air emissions at the facility and compliance with your current operating permits. A representative of the Pennsylvania Department of Environmental Protection (PaDEP) may also be participating. EPA will be represented by myself and Jerry Curtin of the Philadelphia Regional Office.

Please be prepared to discuss and have documents available to show the status of your facility with regards to the emissions, operations, and testing, monitoring, reporting and record keeping requirements of the permit. Also, it is requested that appropriate personnel be available to discuss your operations. EPA requests that the information outlined in Enclosure (1) be made available to EPA and PaDEP during the inspection for review. Please review this enclosure and be prepared to discuss the requested information during the inspection. Please contact me at 215-814-2161 by May 25, 2012 to confirm your receipt of this notification.

Sincerely,

James Hagedorn
EPA Air Enforcement Officer

Copy to: Mark Wejkszner, PaDEP (via email)

Enclosure (1)-Information Requested

A. General Information Requested to be made available during the inspection.

1. Site map/Organization Chart
2. Copies of Air Permits issued since 2005
3. Facility Annual Air Emission Reports or Inventories (2006-2011)
4. A concise list of currently operational devices producing air emissions (including
all operational boilers) and air pollution control equipment. Equipment should specify age and size.
5. Fuel Usage Reports and Fuel Quality Reports (2006-11)
6. List of Flares if any and make, model of flares along with operations manual.
7. Records of electricity production or usage (2006-2011) on an individual source basis if available.
8. List of tanks, their size, capacity and age, and contents
9. Test results of all testing done on air emission sources from 2006-present
10. Records of COMs and CEMs data beginning in 2006; any Method 9 readings taken.
11. A list of capital projects implemented beginning in 2006 and costing over \$50,000. For any projects costing over \$300,000, provide the cost/benefit analysis. Provide records of any NSR/PSD analyses done at any time period.
12. A list of refrigeration equipment on site (listing of each unit, its cooling capacity, type and amount of refrigerant in it, records of maintenance conducted on it since 2006; provide certification of technicians who service AC including contractor personnel)
13. A list of any parts cleaners on site (size, type of solvent used, MSDS)
14. Other records or monitoring data specifically called for by your Title V permit.
15. Data/records on any equipment subject to NSPS or MACT rules
16. Annual Title V compliance certification reports for 2009 thru 2011.
17. Production records for plant generation from 2006 to 2011.
18. Generation Availability Data System reports as submitted to NERC showing generation losses for forced outages, planned outages, and causes of forced outages.

Plant daily inspections